

HON. JAMAL N. WHITEHEAD

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

VALVE CORPORATION,

Plaintiff,

V.

LEIGH ROTHSCHILD, ROTHSCHILD BROADCAST DISTRIBUTION SYSTEMS, LLC, DISPLAY TECHNOLOGIES, LLC, PATENT ASSET MANAGEMENT, LLC, MEYLER LEGAL, PLLC, AND SAMUEL MEYLER.

Defendants.

Case No. 2:23-cv-1016

**DECLARATION OF KATHLEEN R.
GEYER IN SUPPORT OF PLAINTIFF
VALVE CORPORATION'S MOTION TO
DISMISS**

**NOTE ON MOTION CALENDAR:
January 24, 2025**

Complaint Filed: 07/07/2023

ORAL ARGUMENT REQUESTED

1 I, Kathleen R. Geyer, declare as follows:

2 1. I am an attorney duly licensed to practice law in the State of Washington and
3 admitted to this Court. I am an associate in the law firm of Kilpatrick Townsend & Stockton LLP,
4 counsel for Plaintiff Valve Corporation in the above referenced action.

5 2. I have personal knowledge of the facts stated in this declaration and, if called upon
6 to do so, I could and would competently testify thereto.

7 3. Attached hereto as **Exhibit 1** is a true and correct copy of an email chain between
8 counsel for Valve and counsel for Defendants with the subject “Valve v. Rothschild, et al. –
9 follow up re: amending counterclaims.”

10 4. Attached hereto as **Exhibit 2** is a true and correct copy of an email chain between
11 counsel for Valve and counsel for Defendants with the subject “Valve v. Rothschild, et al. – Meet
12 and Confer re Motions to Dismiss and Strike Defendants’ Amended Answer & Counterclaims.”

13 I declare under penalty of perjury under the laws of the United States of America that the
14 foregoing is true and correct.

15 Executed on December 20, 2024 at Seattle, Washington.

16 */s/ Kathleen R. Geyer*
17 Kathleen R. Geyer